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Southern District of New York
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January 17, 2024

Via ECF

Hon. Victor Marrero
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Edward Rivas
         23 Cr. 534 (VM)

> Request **GRANTED.** Defendant's pretrial release
> condition of home detention is hereby modified to a curfew
> and location monitoring to be set at the direction of Pretrial
> Services.
>
> **SO ORDERED.**
>
> 18 January 2024
>
> **DATE**   VICTOR MARRERO, U.S.D.J.

Dear Judge Marrero,

   I write to respectfully request that Mr. Rivas's pretrial release condition of home detention be modified to a curfew to be set at the direction of Pretrial Services. Pretrial Services and the Government consent to this request.

   Mr. Rivas was arrested on August 18, 2023 and ordered released subject to certain conditions including home detention to be monitored by location monitoring. Since his release upon the satisfaction of his bail conditions, Mr. Rivas has been continuously employed as a building superintendent at locations around New York City. This work often requires him to travel to different locations in a single day, which makes pre-reporting his precise schedule to Pretrial Services challenging. Given his overall record of compliance with his pretrial release conditions, and with the consent of Pretrial Services, the defense respectfully requests that the home detention condition be modified to a curfew, with the curfew and location monitoring to be set at the direction of Pretrial Services.

   We thank the Court for its consideration of this request.

                                        Respectfully submitted,

                                        /s/

                                        Neil P. Kelly
                                        Assistant Federal Defender
                                        (212) 417-8744

cc: AUSA Maggie Lynaugh
       Pretrial Services Officer Ashley Cosme